

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Allstate Insurance Company; Allstate Indemnity Company; Allstate Property and Casualty Insurance Company; Deerbrook Insurance Company; Encompass Indemnity Company; and Northbrook Indemnity Company;

Plaintiffs,

V.

Eduardo Bullon; Rafael Mendez;
Advanced Imaging MRI of Minnesota, LLC;
Spine Imaging MRI, LLC; William J. Ford,
III, M.D.; Jorge Bullon; Naida Hernandez
Gonzales; Central Medical Clinic, LLC –
Clinica Central; Central Neurology Clinic,
LLC; Alfonso Morales-Utrilla, M.C.; and
Hans M. Castro, D.C.;

Defendants.

Court File No. 10-4636 (ADM/FLN)

**MOTION TO DISMISS
PLAINTIFFS' COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 9(b), Defendants Eduardo Bullon, Advanced Imaging MRI of Minnesota, Spine Imaging MRI, LLC, Jorge Bullon, Naida Hernandez Gonzalez, Central Medical Clinic LLC, Central Neurology Clinic, Alfonso Morales-Utrilla, and Hans Castro through their undersigned counsel, move the Court for an Order dismissing Plaintiffs' complaint with prejudice. The grounds for this motion are that the Complaint fails to state claims upon which relief can be granted, and fails to plead claims with particularity. Defendants will separately file a supporting memorandum of law and other documents according to Local Rule 7.1(b).

Dated: December 9, 2010

s/ Eric C. Tostrud

Eric C. Tostrud (MN #213548)

Matthew R. Salzwedel (MN #0312903)

David W. Asp (MN #344850)

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

Telephone: (612) 339-6900

ectostrud@locklaw.com

mrsalzwedel@locklaw.com

dwasp@locklaw.com

**ATTORNEYS FOR DEFENDANTS
EDUARDO BULLON, ADVANCED
IMAGING MRI OF MINNESOTA, SPINE
IMAGING MRI, LLC, JORGE BULLON,
NAIDA HERNANDEZ GONZALEZ,
CENTRAL MEDICAL CLINIC LLC,
CENTRAL NEUROLOGY CLINIC,
ALFONSO MORALES-UTRILLA, AND
HANS CASTRO**